

STROOCK

March 22, 2022

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Hon. Ona T. Wang
United States Courthouse
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Audish v. American Express, Case No. 1:21-cv-10127-GHW-OTW

Dear Judge Wang:

We represent defendant American Express National Bank (“American Express”), sued as American Express Company, and write together with counsel for plaintiff Andrea Audish (“Plaintiff”) to respectfully request an adjournment of the initial conference scheduled for March 30, 2022.

American Express intends to file a motion to compel arbitration of the claims against it (the “Motion”). In order to avoid the expenditure of efforts by the parties and the Court that could be mooted if this action is compelled to arbitration, the parties request an adjournment of the initial conference until after a ruling on the Motion.

This is the first request for an adjournment of the conference. Further, to avoid delay, the parties jointly propose the following briefing schedule for the Court’s consideration:

- American Express shall file its Motion on or before April 28, 2022;
- Plaintiff shall file her opposition to the Motion on or before May 26, 2022; and
- American Express shall file its reply in support of the Motion on or before June 16, 2022.

Respectfully submitted,

/s/ *Raymond A. Garcia*

cc: All parties (via ECF)